

ORGANIC FARMING - LIST OF PRODUCTS & SUBSTANCES AUTHORISED IN ORGANIC PRODUCTION (UPDATE)

A.I.S.E. feedback on the public consultation

22 April 2021

A.I.S.E. represents over 900 companies supplying household and professional cleaning products and services across Europe. Companies in the professional cleaning sector (PC&H) of A.I.S.E. contribute to securing high levels of cleanliness and – where appropriate – disinfection. A.I.S.E. PC&H companies represent a significant market share in the European food, beverage, and agriculture sectors. PC&H companies also offer solutions to the organic food production sector.

Proper hygiene in organic food production significantly reduces the risk of food spoilage and foodborne illness, just as in regular food production. Organic food producers need to have access to effective cleaning and disinfection products to achieve this hygiene. Forcing organic food producers to use certain substances will severely inhibit them in maintaining good hygiene and quality standards for organic food. We are of the opinion that clearly defined criteria are needed for the selection of substances that would achieve the goals of the legislation. ‘Positive lists’ of substances/products are too complex to manage and will hamper innovation ([see A.I.S.E. position of January 2021](#)).

In general, A.I.S.E. welcomes the postponement of the application of Regulation (EU) 2018/848 for cleaning and disinfection products, as a huge amount of work is still needed to develop a proposal that considers all aspects of the organic production regulation, while maintaining a high level of hygiene and quality standards. We would like to reiterate that safe and effective cleaning and disinfection products are as important in the organic production and processing as in conventional food production to prevent food contamination and subsequent public health issues. Having said that, we are of the opinion that a positive list of cleaning and disinfecting substances approved for the organic production and processing listed in an annex to the Regulation could result in a lack of approved substances which would undermine the safety of the organic production and processing. In our view, the addition of extensive requirements or restrictions on top of those stipulated in REACH, CLP and BPR Regulations will also severely restrict the availability of disinfection products for organic food.

In order to find the right balance and consider all the aspects of the topic, we would like to ask for closer cooperation between the EU legislator and representatives of the professional cleaning and hygiene products industry.

As regards the draft annex IV, clarity is required to better understand Part D. If the objective of Part D was to ban active substances which are not compliant with the Biocidal Products Regulation (EU) N° 528/2012 (since they are not listed in the review program), then we do not understand the entry “peroxyacetic acids” as it covers peracetic acid which is an active substance fully compliant with the BPR. Hence, we ask for the deletion of the entry “peroxyacetic acids” from part D of annex IV.